

FILED
U.S. DISTRICT COURT
IN THE UNITED STATES DISTRICT COURT MARYLAND
FOR THE DISTRICT OF MARYLAND
(Northern Division) 2000 NOV 14 P 2: 54

BRIAN ALKINS,
DIANE ALKINS,
MATTHEW C. ALKINS,
SUZANNE M. ALKINS,
ANDREW M. ALKINS,
DAVID L. MASON,
ELEANOR L. MASON, and
ANDREW MASON,

Plaintiffs,

v.

Civil Action No. WMN-00-562

HONEYWELL INTERNATIONAL
INC.

and

ALLIEDSIGNAL RETIREE
MEDICAL PLAN,

ALLIEDSIGNAL SALARIED
EMPLOYEES PENSION PLAN

and

RAYTHEON ELECTRO SPACE
SYSTEMS INC.

Defendants.

* * * * *

**DEFENDANT HONEYWELL INTERNATIONAL, INC., ALLIEDSIGNAL RETIREE
MEDICAL PLAN, AND ALLIEDSIGNAL SALARIED EMPLOYEES PENSION PLAN'S
PROPOSED PROTECTIVE ORDER**

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This matter having come before the Court as a result of Plaintiff David Mason's Certificate of Compliance with Motion to Compel Procedures, pursuant to Rule 26(c)(2), (7) of the Federal Rules of Civil Procedure and Local Rules 104.13 and 105.11 this Court hereby orders the following:

1. Honeywell International Inc. (Honeywell) shall produce the names and addresses of participants in the AlliedSignal Benefit Plan who were employed in Towson, Maryland on September 8, 1998, as well as the names of all beneficiaries of such participants (to the extent available and accessible from company computer records). Defendants believe and have advised Plaintiffs that this information is individually identifiable health information pursuant to the Health Insurance Portability and Accountability Act (HIPAA) and may only be revealed as described below.

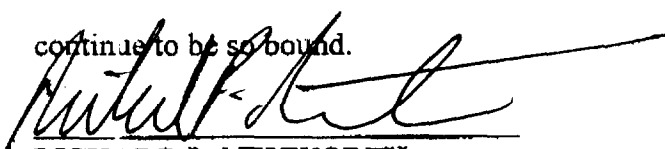
2. The information described in paragraph 1 shall be filed with the Clerk of the Court in envelopes bearing the following designation: "CONFIDENTIAL-USE RESTRICTED BY COURT ORDER." This information shall be made available only to those persons authorized by this Order and to the Court. At the end of this litigation the Clerk of the Court shall return the information described in paragraph 1 to counsel for Honeywell.

3. Upon production, the information described in paragraph 1 shall be used solely for the purpose of this litigation. That purpose may include contacting the participants and beneficiaries in the AlliedSignal Benefit Plan described in paragraph 1, but only if the individuals contacted are provided a copy of this Protective Order contemporaneously with the contact. Only the attorneys for the named plaintiffs shall have access to or information about the names and addresses provided. Plaintiffs, named or otherwise, will not have access to or information about the names and addresses provided. The information described in paragraph 1 will not be disclosed to anyone, whether or not a party to this suit,


without written authority from this Court. Copies of this protective order will be provided by plaintiffs, along with notice of the existence of the class action, to every participant and beneficiary described in paragraph 1 contacted.

4. Within 30 days of final adjudication of this matter, including final adjudication of any appeals or petitions for extraordinary writs, all copies of the information described in paragraph 1, including, but not limited to, letters or other documents including the information and electronic copies of the information, shall be returned to counsel for Honeywell.

5. Notwithstanding the return of the information described in paragraph 1, any person otherwise bound by the terms of this Order not to disclose the information described in paragraph 1 shall continue to be so bound.


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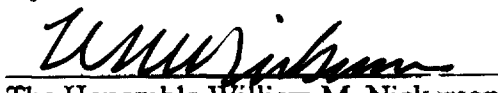
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Attorneys for Defendants
Honeywell International Inc.,
AlliedSignal Retiree Medical Plan, and
AlliedSignal Salaried Employees Pension Plan

SO ORDERED this 14th day of November, 2000.

By the Court:


The Honorable William M. Nickerson
United States District Court Judge